



AMERICAN SOCIETY OF LANDSCAPE ARCHITECTS

CALIFORNIA COUNCIL
AMERICAN SOCIETY OF
LANDSCAPE ARCHITECTS

July 15, 2015

Julie Saare-Edmonds
Water Use and Efficiency Program
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

RE: Proposed Revisions to the Model Water Efficient Landscape Ordinance based on public comment received on the June 12th draft

Dear Julie:

On behalf of the California Council, American Society of Landscape Architects (CCASLA), please accept our organization's comments and recommendations regarding the further revision of the proposed MWELO update. CCASLA represents the interests of landscape architects who rely on water efficient landscape ordinances to help direct their landscape design projects on a daily basis. Although we fully support updating the Ordinance as a measure of helping to ensure that California benefits from a realistic, achievable approach to water conservation, we remain concerned in regards to the following items:

Applicability (Section 490.1), Provisions for Existing Landscapes (Section 493), and Appendix D – The Ordinance recognizes that significant water savings could occur with the appropriate retrofitting, operation, and maintenance of existing irrigation systems. As such, we reiterate that an equal if not greater emphasis should be placed on Section 493 and addressing existing irrigation system efficiency. To achieve this goal, CCASLA recommends the following:

- Existing large turf areas with older overhead irrigation systems typically have the highest amount of water waste. Provide incentive for these existing landscapes greater than 2,500SF to receive an irrigation audit and system retrofit with the explicit goal of achieving an irrigation efficiency (IE) rate of 0.75.
- Projects that have successfully complied with current MWELO requirements should be exempt from further water restrictions resulting from local municipal and/or water agency implementation of the MWELO update.
- Per the July 9th Revisions, CCASLA feels that the prescriptive checklist approach (Appendix D) as written will fail to provide an adequate incentive since this approach is overly prescriptive in regards to the use of very low-, low-, moderate, and high-water use plants and the prescribed planting area factors. The alternative appears counter-intuitive in that the removal of submittal items (e.g. soil testing, irrigation audits and grading plans), which are specifically designed to address critical planting and irrigation factors, will likely lead to an increase in landscape failures in the future, not less. CCASLA recommends keeping the MWELO applicability to an aggregate 2,500 SF of landscape area and dropping the prescriptive checklist approach as overly confusing, restrictive, and difficult to monitor.

Water Efficient Landscape Worksheet (Section 492.4) – CCASLA commends the simplification of the worksheet and the provision to factor water use on a hydrozone-basis rather than a single site factor. This will help provide maximum flexibility in addressing individual site conditions and design options.

Irrigation Efficiency (Section 492.13) and Effective Precipitation (Section 494) – CCASLA continues to stress that any proposed adjustments to the MAWA calculation formula should reflect scientifically-verifiable studies conducted in such a manner as to simulate a variety of climatic and field conditions using a variety of vegetation types. This will help ensure that water conservation goals can be realistically achieved given the diverse nature of California's landscape and specific site conditions. To achieve this goal, CCASLA recommends the following:

- Recognize that several other factors such as slope, type and density of plant material being established, soil conditions, and type of irrigation equipment, amongst others, will directly affect achievable effective precipitation rates.
- The MWEL0 update should allow for local flexibility in determining appropriate landscape and irrigation design treatments to factor specific project site conditions.
- The use of currently available irrigation technologies, including overhead spray and rotors should continue to be allowed if precisely matched to irrigation needs based on site conditions, vegetation type, and irrigation efficiency goals. This will help ensure that irrigation efficiency is matched to local soil conditions.
- Per the July 9th Revisions, DWR should commit to carefully reexamining the MAWA evapotranspiration adjustment factors (ETAF) and other irrigation efficiency values to appropriately align with intended water conservation goals. A balanced, achievable approach should drive this endeavor.

Soil Preparation, Mulch and Amendments (Section 492.6 (a) (3)) – Soil conditions play a key role in determining effective precipitation. This is especially true in urban areas where trees are to be planted. Soil preparation and the appropriate use of mulch and amendments are not only critical in the establishment of plant materials, but their long term maintenance and survival. To help ensure these factors continue receiving appropriate attention, CCASLA recommends:

- Greater emphasis should be placed on effectively addressing urban soil conditions at each stage of design and local plan review.
- Soil treatment should be based on specific site conditions as described in soil analysis and site engineering reports, type of plant material, slope, exposure, and other site conditions, not a generalized prescribed approach, e.g. minimum rates at prescribed depths.
- Beneficial Insect Habitat (Section 492.6 (a) (3) (D)) – This provision appears confusing and does not provide enough background information to fully describe its implication. The prescriptive allowance, e.g. 5 % of the landscape area, should be removed in favor of a provision which factors a scientific approach to maintaining regenerative site conditions favorable to all wildlife species.
- Continued monitoring of soil conditions and verification of the appropriate use of mulch and amendments should be noted as a part of each irrigation audit as applicable.
- In urban, confined planting areas, adequate soil volumes should be provided to ensure healthy plant growth and the deep rooting of tree species in particular.

CCASLA Response to June 12, 2015 Public Draft, Model Water Efficient Landscape Ordinance (MWEL0)

- Require that the installing contractor provide material evidence (invoices) documenting that all soil amendments were installed, and that all required irrigation system components are attributable to the project with material invoices from the vendor showing the job name on it.
- Literature and other informational materials of the International Society of Arboriculture (ISA), the Nursery Growers Association of California (NGA), and others should be incorporated as a reference in the proper cultivation, installation, and maintenance of plant materials.

Landscape Stakeholder Committee – CCASLA's comments and recommendations are based on a logical, achievable approach to improving water conservation savings in the landscape. We welcome additional opportunities to address these issues both as licensed, educated landscape professionals, and as concerned citizens. We ask that CCASLA be contacted directly in order to recommend one or more licensed landscape architecture practitioners for inclusion on the Landscape Stakeholder Committee. Our unique training and education allows us to approach water conservation in the landscape both holistically and technically. This approach will help build public trust and understanding as well as lend legitimacy to California's regulatory environment.

CCASLA firmly believes in the importance of healthy landscapes, especially in the public sector as a key component in protecting the public health, safety, and welfare. The appropriate use of water in the landscape is critical in helping maintain these valuable assets. CCASLA will continue to remain actively involved in the examination of all aspects and factors affecting the design, implementation, and maintenance of these California landscapes. We look forward to participating in upcoming workshops and guidance on the revised ordinance and all future opportunities to comment on the MWEL0. Please feel free to contact me should you have any questions or desire further discussion.

Sincerely,



Jon Wreschinsky, President
California Council of ASLA